C. Marie Eckert, P.C., OSB No. 883490 marie.eckert@millernash.com

John C. Clarke, OSB No. 153245 john.clarke@millernash.com

MILLER NASH LLP

US Bancorp Tower

111 SW Fifth Ave, Ste 3400

Portland, OR 97204

Telephone: 503.224.5858 Facsimile: 503.224.0155

Craig D. Leavell, ISB No. 6256260

Admitted Pro Hac Vice
craig.leavell@btlaw.com
Casey G. Campbell, ISB No. 6318370

Admitted Pro Hac Vice
casey.campbell@btlaw.com
BARNES & THORNBURG LLP
One N Wacker Dr, Ste 4400
Chicago, IL 60606

Telephone: 312.214.4868 Facsimile: 312.759.5646

Attorneys for National Steel Car Limited

Mark C. Nelson, TSB No. 00794361

Admitted Pro Hac Vice mark.nelson@btlaw.com

Daniel A. Valenzuela, TSB No. 24067918

Admitted Pro Hac Vice daniel.valenzuela@btlaw.com BARNES & THORNBURG LLP 2121 N Pearl St, Ste 700 Dallas, TX 75201

Telephone: 214.258.4150 Facsimile: 214.258.4199

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

PORTLAND DIVISON

NATIONAL STEEL CAR LIMITED, a Canadian corporation,

Plaintiff,

v.

GREENBRIER-CONCARRIL LLC, a Delaware limited liability company; and GREENBRIER LEASING COMPANY, LLC, a Delaware limited liability company,

Defendants.

Case No. 3:20-cv-01275-YY

JOINT STIPULATION TO ADD DEFENDANT

Page 1 - Joint Stipulation to Add Defendant

MILLER NASH LLP ATTORNEYS AT LAW TELEPHONE: 503.224.5858 US BANCORP TOWER 111 SW FIFTH AVE, STE 3400 PORTLAND, OR 97204 Plaintiff, National Steel Car Limited ("NSC"), and Defendants Greenbrier Leasing Company, LLC ("Greenbrier Leasing") and Greenbrier-Concarril, LLC ("Greenbrier-Concarril") (collectively "Greenbrier"), hereby stipulate and jointly move to add the following party to the named defendants as follows:

- 1. Greenbrier-GIMSA, LLC is added as a defendant in this matter.
- 2. NSC, Greenbrier, and Greenbrier-GIMSA, LLC agree that, like Greenbrier-Concarril, LLC, and Greenbrier Leasing Company, LLC, Greenbrier-GIMSA, LLC, "steps into the shoes" of, and substitutes for former defendant, The Greenbrier Companies, Inc., for all purposes in this case including, but not limited to, discovery, claim construction, and the Protective Order.

DATED this 7th day of February, 2022.

/s/ C. Marie Eckert	/s/ Brian Apel
C. Marie Eckert, P.C., OSB No. 883490	Steven T. Lovett, OSB No. 910701
marie.eckert@millernash.com	steve.lovett@stoel.com
John C. Clarke, OSB No. 153245	Nathan C. Brunette, OSB No. 090913
john.clarke@millernash.com	nathan.brunette@stoel.com
MILLER NASH LLP	Elliott J. Williams, OSB No. 144835
US Bancorp Tower	elliott.williams@stoel.com
111 SW Fifth Ave, Ste 3400	STOEL RIVES LLP
Portland, OR 97204	760 SW Ninth Ave, Ste 3000
T: 503.224.5858 F: 503.224.0155	Portland, OR 97205
•	T: 503.224.3380 F: 503.220.2480
Craig D. Leavell (<i>Pro Hac Vice</i>)	
craig.leavell@btlaw.com	///
Casey G. Campbell (<i>Pro Hac Vice</i>)	///
casey.campbell@btlaw.com	///
BARNES & THORNBURG LLP	///
One N Wacker Dr, Ste 4400	///
Chicago, IL 60606	///
T: 312.214.4868 F: 312.759.5646	///
	///
///	///
///	
///	
///	///

Page 2 - Joint Stipulation to Add Defendant

Mark C. Nelson (*Pro Hac Vice*) mark.nelson@btlaw.com
Daniel A. Valenzuela (*Pro Hac Vice*) daniel.valenzuela@btlaw.com
BARNES & THORNBURG LLP
2121 N Pearl St, Ste 700
Dallas, TX 75201
T: 214.258.4150 | F: 214.258.4199

Attorneys for Plaintiff National Steel Car Limited Marc S. Cooperman (*Pro Hac Vice*) mcooperman@bannerwitcoff.com
J. Pieter van Es (*Pro Hac Vice*) pvanes@bannerwitcoff.com
Audra C. Eidem Heinze (*Pro Hac Vice*) aheinze@bannerwitcoff.com
Brian Apel (*Pro Hac Vice*) bapel@bannerwitcoff.com
BANNER & WITCOFF, LTD.
71 S Wacker Dr, Ste 3600
Chicago, IL 60606
T: 312.463.5000 | F: 312.463.5001

Attorneys for Greenbrier Defendants

Page 3 - Joint Stipulation to Add Defendant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Joint Stipulation to Add Defendant on:

Audra C. Eidem Heinze aheinze@bannerwitcoff.com
Brian T. Apel bapel@bannerwitcoff.com
J. Pieter van Es
pvanes@bannerwitcoff.com
Marc S. Cooperman
mcooperman@bannerwitcoff.com
Janice V. Mitrius
jmitrius@bannerwitcoff.com
BANNER & WITCOFF, LTD.
71 S Wacker Dr, Ste 3600
Chicago, IL 60606

Nathan C. Brunette nathan.brunette@stoel.com Steven T. Lovett steve.lovett@stoel.com STOEL RIVES LLP 760 SW Ninth Ave, Ste 3000 Portland, OR 97205

Attorneys for Greenbrier Defendants

by the following indicated methods on the date set forth below:

×	CM/ECF system transmission.
	E-mail. As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
×	E-mail (courtesy copy).
	Facsimile communication device.
	First-class mail, postage prepaid.
	Hand-delivery.
	Overnight courier, delivery prepaid.
DATED: February 7, 2022.	

Page 1 - Certificate of Service

/s/ C. Marie Eckert

C. Marie Eckert, P.C., OSB No. 883490 *Of Attorneys for National Steel Car Limited*